

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO GREETING CARD ASSOCIATION INTERROGATORIES [ERRATA]**  
(March 20, 2012)

The Postal Service hereby gives notice of the filing of errata to Postal Service witness Martin's February 10, 2012, responses to interrogatories of the Greeting Card Association (GCA).

On March 20, 2012, the Postal Service filed errata to the Direct Testimony of Cheryl Martin (USPS-T-6). On March 19, 2012, the Postal Service filed errata to library reference USPS-LR-N2012-1/11. The Postal Service is filing revisions to the following interrogatories to ensure that the responses conform to these testimony and library reference revisions.

- GCA/USPS-T6-1
- GCA/USPS-T6-4

Other corrections were made to the headers of the responses. The attached, revised responses supersede the responses filed on February 10, 2012. Revisions are highlighted in grey.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO GREETING CARD ASSOCIATION INTERROGATORY**

**GCA/USPS-T6-1.** Please refer to page 9, lines 11-23, of your prefiled testimony, and to the first page of Library Reference USPS-N2012-1/11 ("Plant to Plant Transportation Summary").

(a) Was the 24.71 percent reduction reported in both the above-cited locations arrived at by averaging the unrounded percent reductions in the last column of the above-cited spreadsheet? If your answer is not an unqualified "yes," please fully explain how the 24.71 percent was arrived at.

(b) Please explain how, if at all, route miles, annual frequency of trips, utilization, and vehicle capacity entered into the derivation of the 24.71 percent reduction.

[(c)] Please confirm that the 1,723 total trips shown as the total of the second column are identical with the trips listed in the second spreadsheet of Library Reference USPS-N2012-1/11 ("Plant to Plant Trips"). If you do not confirm, please explain fully.

**RESPONSE:**

(a) Yes.

(b) The 24.39 percent reduction figure was derived by dividing the number of trips that could be eliminated through network rationalization by the number of trips that I studied. To determine whether a trip was a candidate for elimination, I identified trips with low utilization and trips that would no longer be necessary due to a facility closure and/or the diversion of mail from surface transportation to air transportation. See USPS-T-6, at 9. Because vehicle capacity is a factor in determining utilization, vehicle capacity was an implicit factor in my analysis. Please see my response to PR/USPS-T6-4(b). Route miles and annual frequency of trips did not play a role in identifying trips for possible elimination.

(c) Confirmed.

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**GCA/USPS-T6-4.** Please refer to your prefiled testimony at page 9, lines 19-21, and page 12, lines 21-23.

(a) Please explain fully why the 24.71 percent reduction cited on page 9 is described as a reduction in “plant-to-plant transportation” and the 13.68 percent reduction cited on page 12 as a reduction in “operating miles.”

(b) If the two expressions quoted in (a) are not equivalent, please explain fully how, if at all, they can be made commensurable with one another.

**RESPONSE:**

(a) The 24.39 percent reduction cited on page 9 represents an estimated reduction in “trips” within the plant-to-plant (i.e., long-haul) network.

Please see my response to NPHMU/USPS-T6-11. Because, the potential for trip elimination is much greater in the plant-to-plant network than in the plant-to-post office network, and because it is easier to conceptualize the plant-to-plant network in terms of the individual trips that comprise that network, I evaluated those trips using the criteria discussed in my testimony. Please see my response to GCA/USPS-T6-1(b). In contrast, the transportation analyses contained in AMP studies focus on the operating miles of impacted routes. Therefore, the 13.68 percent reduction cited on page 12 of my testimony is expressed in terms of a reduction in “operating miles.” Please see my response to NPHMU/USPS-T6-12.

(b) The two expressions are not equivalent. To convert trips into operating miles, one should multiply the number of miles that a trip takes by the frequency of the trip. For example, if a trip is scheduled to travel ten (10) miles each day and the annual frequency of the trip is three hundred and three (303) days, the number of operating miles for that trip would be three

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**RESPONSE TO GCA/USPS-T6-4 (CONT.):**

thousand and thirty (3030) miles.